

## Exhibit A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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MONSANTO COMPANY and MONSANTO	:	
TECHNOLGY,	:	
	:	
Plaintiffs/Counterclaim-Defendants,	:	No. 09-CIV-686
	:	
v.	:	
	:	
E.I. DU PONT DE NEMOURS AND COMPANY	:	
and PIONEER HI-BRED INTERNATIONAL INC.,	:	
	:	
Defendants/Counterclaim-Plaintiffs.	:	
-----	X	

**DUPONT AND PIONEER'S THIRD SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO MONSANTO**

Defendants/Counterclaim-Plaintiffs E.I. du Pont de Nemours and Company and Pioneer Hi-Bred International Inc. request, under Federal Rules of Civil Procedure 26 and 34, that Plaintiffs/Counterclaim-Defendants Monsanto Company and Monsanto Technology, produce for inspection and copying all documents and tangible things disclosed below in accordance with the Definitions and Instructions set forth below at the offices of one of Defendants/Counterclaim-Plaintiffs' counsel:

Kaye Scholer LLP, 425 Park Ave., New York, New York 10022; or

Boies, Schiller & Flexner LLP, 5301 Wis. Ave., N.W., Washington, D.C. 20015  
as soon as practicable, but in no event later than thirty (30) days after service hereof.  
Each of the following requests is continuing in nature, such that if Plaintiffs/Counterclaim-Defendants obtain or discover additional responsive documents and things at a later date, such documents and things are to be made available to Defendants/Counterclaim-Plaintiffs for inspection and copying.

70. If in answering these requests you claim any ambiguity exists in either the request or an applicable definition or instruction, identify in your response the language you consider ambiguous and state the interpretation you are using in responding.

### **REQUESTS FOR PRODUCTION**

1. Documents sufficient to identify all instances where Monsanto has asserted rights under the '435 Patent, or the '247 Patent, or infringement of the claims of the '435 Patent or '247 Patent, including, without limitation, all litigations, mediations, arbitrations or cease and desist letters, and all communications and/or public statements asserting rights under such patents.

2. All documents concerning any litigation, threatened litigation, negotiation, settlement, arbitration, joint venture or agreement involving the '435 Patent, '247 Patent, any related patent or patent application, and/or Roundup Ready Products or Roundup Ready 2 Products, including all draft and final versions of pleadings, all docketed documents, correspondence, discovery requests, responses and objections to discovery requests, and all data reviewed, relied on, or shown to experts, all expert reports, all testimony, transcripts from depositions, interviews, trials and hearings, and production documents, subpoenas and other things relied upon as demonstrative exhibits or evidence at trial; all external references relied upon; and any other document or communication related to any subsequent appeals or adjudication. This request seeks documents concerning the following proceedings, but is not limited thereto:

- (a) Monsanto Co. v. Allison, 07-cv-0029 (E.D. Mo.);
- (b) Monsanto Co. v. Barry, 8-cv-3012 (C.D. Ill.);
- (c) Monsanto Co. v. Bowman, 2:07-CV-00283-RLY-WGH (S.D. Ind.);
- (d) Monsanto Co. v. Collins, 09-cv-195 (E.D. Mo.);

- (e) Monsanto Co. v. Dart, 09-cv-474 (E.D. Mo.);
- (f) Monsanto Co. v. Dorris, 07-cv-0012 (E.D. Mo.);
- (g) Monsanto Co. v. Foster, 07-cv-0833 (E.D. Mo.);
- (h) Monsanto Co. v. Gastel, 07-cv-5119 (W.D. Mo.);
- (i) Monsanto v. Jarrell, 07-cv-0118 (E.D. Mo.);
- (j) Monsanto Co. v. Krone, 07-cv-0345 (E.D. Mo.);
- (k) Monsanto Co. v. LaValle, 08-cv-0043 (E.D. Mo.);
- (l) Monsanto Co. v. Ledbetter, 8-cv-58 (N.D. Tex.);
- (m) Monsanto Co. v. Manhart, 09-172 (E.D. Mo.);
- (n) Monsanto Co. v. Markert, 8-cv-3022 (C.D. Ill.);
- (o) Monsanto Co. v. Pilman, 08-cv-2020 (E.D. Mo.);
- (p) Monsanto Co. v. Pool, 09-185 (E.D. Mo.);
- (q) Monsanto Co. v. Potts, 04-cv-0282 (S.D. Ohio);
- (r) Monsanto Co. v. Schaffnit, 08-cv-3023 (C.D. Ill.);
- (s) Monsanto Co. v. Scruggs, No. 00-00161-WAP-JAD (N.D. Miss.);
- (t) Monsanto Co. v. Strickland, 05-cv-3062 (D.S.C.);
- (u) Monsanto Co. v. Syngenta Seeds, Inc. (D. Del.);
- (v) Monsanto Co. v. Tidball, 07-cv-2078 (E.D. Mo.);
- (w) Monsanto Co. v. Thoroughman, 08-cv-1931 (E.D. Mo.);
- (x) Monsanto Co. v. Trivette, No. 7-cv-343 (E.D. Mo.);
- (y) Monsanto Co v. Woods, 08-0137 (E.D. Mo.).

3. All documents concerning any litigation, threatened litigation, negotiation, settlement, arbitration, joint venture or agreement involving glyphosate tolerant crops,

Dated: March 30, 2010

**LEWIS RICE FINGERSH, L.C.**

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